

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

ROBERT BRAMLETT, MELANY)	
BRAMLETT, SHERRI ENSOR, AND)	
MARSHA MAXWELL,)	Case No.: 1:19-cv-1068-JRN
)	
Plaintiffs,)	
)	
v.)	
)	
HOURLASS MANAGEMENT)	
CORPORATION AND INNOVATIVE)	
FUNDING SERVICES CORPORATION,)	
)	
Defendants.)	

NOTICE OF VIDEO DEPOSITION OF XXXXX

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30, on **DAY**, **DATE**, at **TIME**, Defendants Hourglass Management Corporation and Innovative Funding Services Corporation, by and through its undersigned attorneys, will take the video deposition of **DEPONENT**. In accordance with the Center for Disease Control and Prevention guidelines for mitigating the spread of COVID-19¹, the deposition will be held remotely using a secure platform from the Court Reporting Service. The Deponent, Attorneys, Court Reporter, and Witnesses will all be attending the deposition virtually using their own hardware at their own expense. The deposition will be recorded and taken by stenographic means before an officer authorized to administer oaths.

The parties further agree to the following guidelines

1. There will be no video or audio recording of any portion of the deposition with the exception of the Court Reporting Service hired by the law firm taking the deposition.

¹ See <https://www.cdc.gov/coronavirus/2019-ncov/index.html>.

2. The parties agree that the administration of any oaths via the virtual deposition shall have the same meaning as if taken in person before the Court Reporter.

3. The parties further agree that there shall be no other means of communication with the deponent during the deposition other than the official platform provided by the Court Reporting Service. This limitation applies only to the recorded portions of the deposition and does not apply to breaks taken by either party or their counsel during the deposition.

4. The parties agree that there will be no individuals present at the deposition, either remotely or in the same room as the deponent, except for the parties' counsel and necessary staff, the Court Reporting Services, and the other parties.²

5. The deponent agrees that if he/she consults any document, communication, individual, or other source, including electronically stored information, in responding to any question asked during the deposition that the deponent will during the deposition, promptly provide the identity of the document, communication, individual, or other source consulted.

Respectfully submitted this _____ day of _____, 2020.

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Kayla Dawn Dreyer

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² At the beginning of the deposition and the commencement of each break, the deponent agrees to visually scan the room in which he/she is sitting for their deposition using the video camera on his/her personal electronic device.

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*Attorneys for Defendants Hourglass Management
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Corporation*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing _____ was filed and served electronically, this ____ day of _____, 2020, as follows:

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Attorney for Plaintiffs

/s/ Kayla Dawn Dreyer

Kayla Dawn Dreyer

A duly signed original is on file at the Law Offices
of LEWIS BRISBOIS